

BRIAN COKE NG
40 Ann Street
New York, N.Y. 10038

U.S. BANKRUPTCY COURT
FILED
2019 FEB -8 P 4:12
S.D.N.Y.

Mailing Address:
Church Street Station
P.O. Box 2723
New York, N.Y 10008
Phone: (646) 820.9238
Fax: (646) 820.9238
Email: Brianeng38@gmail.com

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

| | | |
|-------------------------------------|---|---------------------------------|
| In re | : | Chapter 11 |
| SEARS HOLDINGS CORPORATION, et al.. | : | Case No. 18-23538 (RDD) |
| Debtors.: | : | (Jointly Administered) |
| | : | JUDGE: Hon. Robert D. Drain |
| Brian Coke Ng | : | Supreme Court of the State of |
| Plaintiff | : | New York, New York County |
| v. | : | Index No.: 100386/2018 |
| Kmart Corporation, et. Al., | : | |
| Defendant(s) | : | Plaintif/Movant's Letter/Notice |

To: The Honorable Robert D. Drain, United States Bankruptcy Judge,

With respect to my motion for relief to lift the automatic stay (ECF No. 1006) and recent filing in further support (ECF No. 1721), I am respectfully writing and submitting this letter to this Bankruptcy Court, and to you Honorable Robert D. Drain, to confirm and advise that, I will not withdraw my motion, and do not intend to do so, for reason(s) as follows:

1. There are other causes presented to lift the automatic stay, in that, the debtors has come to this court with unclean hands.

The Clean Hands Doctrine

2. The clean hands doctrine is a matter of sound discretion for the court, and should never prevent a court from doing justice.

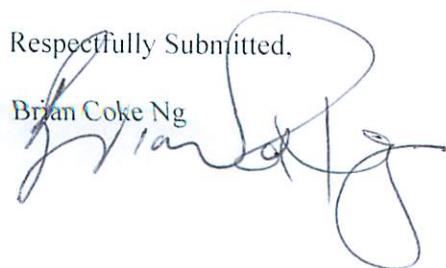
3. The three fundamental rationales that form the basis for the clean hands doctrine are Judicial Integrity, Justice, and the Public Interest.

- First, the clean hands doctrine protects **Judicial Integrity**. Allowing an unclean party/Litigant to recover or obtain the relief he/she seeking would not only abet him/she in his/her inequitable conduct, but would also raise doubts as to the just provided by the Judicial System. Thus, the court must close its door to the unclean party/litigant and refuse to interfere on his/her behalf, allowing the court to remain above inequity.
- Second, the clean hands doctrine promotes **Justice**. Courts use the doctrine to ensure a fair result. Where the party/litigant conduct is such that it would be unjust to allow him/her a remedy or relief, courts can use the doctrine as a bar to the remedy or to the relief. Therefore, withholding assistance from the unclean party/litigant allows courts to prevent a wrongdoer from enjoying the fruits of his/her transgression.
- Third, the clean hands doctrine promotes the **Public Interest**. Courts can use the doctrine where a suit or matter involves a public right or issue. The Supreme Court of the United States has stated that, in cases involving the public interest, the "doctrine assumes wider and more significant proportions." Thus, in suits or matters involving the public interest, a court may not only prevent a wrongdoer from benefitting from his/her transgression, but avoid injury to the public.

4. The clean hands doctrine has been around for a very long time. Here, the debtors had come to this court with unclean hands, as shown and demonstrated in my motion papers. Therefore, I will not withdraw my motion. The debtors can propose ways to peacefully resolve all matters and/or restart the parties settlement negotiation, and I will again welcome it, and seriously consider such effort by them.

Respectfully Submitted,

Brian Coke Ng

A handwritten signature in blue ink, appearing to read "Brian Coke Ng".

BRIAN COKE NG
40 Ann Street
New York, N.Y. 10038

Mailing Address:
Church Street Station
P.O. Box 2723
New York, N.Y 10008
Phone: (646) 820.9238
Fax: (646) 820.9238
Email: Briancng38@gmail.com

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

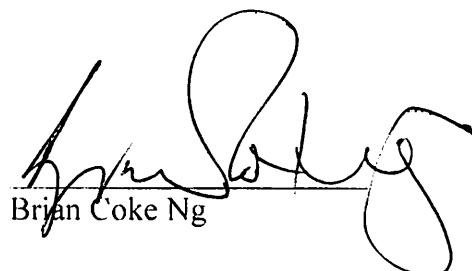
| | | |
|-------------------------------------|---|-----------------------------|
| -----x | | |
| In re | : | Chapter 11 |
| | : | |
| SEARS HOLDINGS CORPORATION, et al., | : | Case No. 18-23538 (RDD) |
| | : | |
| Debtors.: | : | (Jointly Administered) |
| | : | |
| | : | JUDGE: Hon. Robert D. Drain |
| | : | |
| | : | |
| -----x | | |

CERTIFICATE OF SERVICE

I hereby certify that on February 8, 2019 a true and correct copy of the foregoing documents has been served upon the following parties listed on the annexed **Exhibit A** via email, and in the manner indicated thereon.

New York, New York

Dated: February 8, 2019



Brian Coke Ng

EXHIBIT A

EXHIBIT A

| NAME | NOTICE NAME | EMAIL |
|---------------------------------------|---|---|
| Alston & Bird LLP | Attn: James J. Vincequerra | James.Vincequerra@alston.com |
| Alston & Bird LLP | Attn: Leib M. Lerner | leib.lerner@alston.com |
| Ansell Grimm & Aaron, P.C. | Attn: Anthony J. D'Artiglio, Esq. | ajd@ansellgrimm.com |
| ASK LLP | Attn: Edward E. Neiger, Jennifer A. Christian | eneiger@askllp.com jchristian@askllp.com |
| Ballard Spahr LLP | Attn: Dustin P. Branch | branchd@ballardspahr.com |
| Ballard Spahr LLP | Attn: Paul E. Harner, Alyssa E. Kutner | harnerp@ballardspahr.com kutnera@ballardspahr.com |
| Ballard Spahr LLP | Attn: Leslie C. Heilman, Matthew G. Summers | heilmanl@ballardspahr.com summersm@ballardspahr.com |
| Ballard Spahr LLP | Attn: David L. Pollack | pollack@ballardspahr.com |
| Barclay Damon LLP | Attn: Kevin M. Newman | knewman@barclaydamon.com |
| Bayard, P.A. | Attn: Evan T. Miller | emiller@bayardlaw.com |
| Bell Nunnally & Martin LLP | Attn: Russell W. Mills, R. Kent Love | rmills@bellnunnally.com klove@bellnunnally.com |
| Bialson, Bergen & Schwab | Attn: Lawrence M. Schwab, Thomas M. Gaa | Tgaa@bbslaw.com |
| Blank Rome LLP | Attn: Jeffrey Rhodes | JRhodes@BlankRome.com |
| Blank Rome LLP | Attn: Stanley B. Tarr, Evan J. Zucker | Tarr@BlankRome.com EZucker@BlankRome.com |
| Borges & Associates, LLC | Attn: Wanda Borges, Esq., Sue L. Chin, Esq. | bankruptcy@borgeslawllc.com wborges@borgeslawllc.com schin@borgeslawllc.com |
| Brach Eichler LLC | Attn: Anthony M. Rainone | arainone@bracheichler.com |
| Buchalter, A Professional Corporation | Attn: Shawn M. Christianson | schristianson@buchalter.com |

| NAME | NOTICE NAME | EMAIL |
|--|--|---|
| Cafaro Management Company | Attn: Richard T. Davis | rdavis@cafarocompany.com |
| Cahill Gordon & Reindel LLP | Attn: Joel H. Levitin, Richard A. Stieglitz Jr. | jlevitin@cahill.com rstieglitz@cahill.com |
| Carter Conboy Case Blackmore Maloney & Laird, P.C. | Attn: Michael J. Catalfimo, Esq., John R. Canney, IV, Esq. | mcatalfimo@carterconboy.com |
| Carter Ledyard & Milburn LLP | Attn: James Gadsden, Esq. | gadsden@clm.com bankruptcy@clm.com Dennis.roemlein@bnymellon.com |
| Certilman Balin Adler & Hyman, LLP | Attn: Richard J. McCord, Esq., Robert D. Nosek, Esq. | rmccord@certilmanbalin.com rnosek@certilmanbalin.com |
| Chapman and Cutler LLP | Attn: Laura E. Appleby, Steven Wilamowsky | appleby@chapman.com wilamowsky@chapman.com |
| Chiesa Shahinian & Giantomaso PC | Attn: Beth J. Rotenberg, Scott A. Zuber | brotenberg@csglaw.com szuber@csglaw.com |
| Choate, Hall & Stewart LLP | Attn: Kevin J. Simard, Jonathan D. Marshall | ksimard@choate.com jmarshall@choate.com |
| Choi & Park, LLC | Attn: Hyun Suk Choi, Chull S. Park | hchoi@choilandpark.com cspark@choilandpark.com lkleist@choilandpark.com |
| Chuhak & Tecson, P.C. | Attn: Miriam R. Stein | mstein@chuhak.com |
| CKR Law LLP | Attn: Edward L. Schnitzer | eschnitzer@ckrlaw.com |
| Clark Hill Strasburger | Attn: Duane J. Brescia | duane.brescia@clarkhillstrasburger.com |
| Clark Hill, PLC | Attn: David M. Blau | dblau@clarkhill.com |
| Cleary, Gottlieb, Steen & Hamilton LLP | Attn: Sean A. O'Neal, James L. Bromley, Andrew Weaver | soneal@cgsh.com jbromley@cgsh.com aweaver@cgsh.com |
| Computershare Trust Company, N.A. | Attn: Michael A. Smith, Vice President – Corporate Trust | Michael.smith2@computershare.com |

| NAME | NOTICE NAME | EMAIL |
|--|---|---|
| Connolly Gallagher LLP | Attn: Karen C. Bifferato, Kelly M. Conlan, N. Christopher Griffiths | kbifferato@connollygallagher.com kconlan@connollygallagher.com cgriffiths@connollygallagher.com |
| Cozen O'Connor | Attn: Marl E. Felger | mfelger@cozen.com |
| Cravath, Swaine & Moore LLP | Attn: Paul H. Zumbro | pzumbro@cravath.com |
| Davidoff Hutcher & Citron LLP | Attn: David H. Wander, Esq. | dhw@dhclegal.com |
| Davis Polk & Wardwell LLP | Attn: Marshall S. Huebner, Esq., Eli J. Vonnegut, Esq. | marshall.huebner@davispolk.com eli.vonnegut@davispolk.com sears.service@davispolk.com |
| Debevoise & Plimpton LLP | Attn: Erica S. Weisgerber, My Chi To | mcto@debevoise.com eweisgerber@debevoise.com |
| Environmental Protection Agency | Attn: Matthew Leopold, General Counsel | Leopold.matt@Epa.gov |
| Epicor Software Corporation | Attn: Larry Bercovich | lbercovich@epicor.com |
| Felderstein Fitzgerald Willoughby & Pascuzzi LLP | Attn: Paul J. Pascuzzi | ppascuzzi@ffwplaw.com |
| FisherBroyles, LLP | Attn: Mark E. Wilson | mark.wilson@fisherbroyles.com |
| FisherBroyles, LLP | Attn: Patricia B. Fugée | patricia.fugee@fisherbroyles.com |
| Foley & Lardner LLP | Attn: Derek L. Wright | dlwright@foley.com |
| Foley & Lardner LLP | Attn: Michael Small | msmall@foley.com |
| Fox Rothschild LLP | Attn: Paul J. Labov | plabov@foxrothschild.com |
| Fox Rothschild LLP | Attn: Thomas M. Horan | thoran@foxrothschild.com |
| Fox Rothschild, LLP | Attn: Mark E. Hall, Michael R. Herz | mhall@foxrothschild.com mherz@foxrothschild.com |
| Fried, Frank, Harris, Shriver & Jacobson LLP | Attn: Brad Eric Scheler, Scott B. Luftglass, Peter B. Siroka | brad.eric.scheler@friedfrank.com scott.luftglass@friedfrank.com peter.siroka@friedfrank.com |
| Frost Brown Todd LLC | Attn: Ronald E. Gold & AJ Webb | rgold@fbtlaw.com awebb@fbtlaw.com |

| NAME | NOTICE NAME | EMAIL |
|---|--|--|
| Frost Brown Todd LLC | Attn: Edward M. King | tking@fbtlaw.com |
| Fultz Maddox Dickens PLC | Attn: Phillip A. Martin, Laura M. Brymer | pmartin@fmdlegal.com lbrymer@fmdlegal.com |
| Gellert Scali Busenkell & Brown LLC | Attn: Gary F. Seitz | gseitz@gsbblaw.com |
| Gibbons P.C. | Attn: Brett S. Theisen, Natasha M. Songonuga | btheisen@gibbonslaw.com nsongonuga@gibbonslaw.com |
| Gibbons P.C. | Attn: Howard A. Cohen | hcohen@gibbonslaw.com |
| Godfrey & Kahn, S.C. | Attn: Timothy F. Nixon | tnixon@gklaw.com |
| Golenbock Eiseman Assor Bell & Peskoe LLP | Attn: Jonathan L. Flaxer, Esq., Michael S. Weinstein, Esq. | jflaxer@golenbock.com mweinstein@golenbock.com |
| Goodwin Procter LLP | Attn: Barry Z. Bazian | gfox@goodwinlaw.com bbazian@goodwinlaw.com |
| Goulston & Storrs PC | Attn: Douglas B. Rosner | drosner@goulstonstorrs.com |
| Goulston & Storrs PC | Attn: Trevor R. Hoffmann | thoffmann@goulstonstorrs.com |
| Greer, Herz & Adams, LLP | Attn: Frederick Black, Tara B. Annweiler, Marc D. Young | tannweiler@greerherz.com |
| Hahn & Hessen LLP | Attn: Janine M. Figueiredo, Esq. | jfigueiredo@hahnhessen.com |
| Halperin Battaglia Benzija, LLP | Attn: Donna H. Lieberman, Esq. | dlieberman@halperinlaw.net |
| Hanesbrands Inc | Attn: Joia Johnson, Chief Administrative Officer and General Counsel | joia.johnson@hanes.com howard.upchurch@hanes.com |
| Harris Beach PLLC | Attn: Kevin Tompsett, Esq. | ktompsett@harrisbeach.com |
| Herrick, Feinstein LLP | Attn: Stephen B. Selbst | sselbst@herrick.com |
| Higgs Fletcher & Mack LLP | Attn: Martin A. Eliopoulos, Esq. | elio@higgslaw.com |
| Holland & Knight LLP | Attn: Barbra R. Parlin | barbra.parlin@hklaw.com |
| Hunton Andrews Kurth LLP | Attn: Brett L. Gross | bgross@HuntonAK.com |

| NAME | NOTICE NAME | EMAIL |
|---|---|--|
| Husch Blackwell LLP | Attn: Lynn H. Butler | lynn.butler@huschblackwell.com |
| Internal Revenue Service | Attn: Centralized Insolvency Operation | Mimi.M.Wong@irs counsel.treas.gov |
| Internal Revenue Service | Attn: Centralized Insolvency Operation | Mimi.M.Wong@irs counsel.treas.gov |
| Judith Elkin PLLC | Attn: Judith Elkin | elkinj@mac.com |
| Kelley Drye & Warren LLP | Attn: Eric R. Wilson, Esq., Benjamin D. Feder, Esq., T. Charlie Liu, Esq. | KDWBANKRUPTCYDEPARTMENT@KELLEYDRYE.COM bfeder@keldrye.com cliu@keldrye.com |
| Klestadt Winters Jureller Southard & Stevens, LLP | Attn: Sean C. Southard, Lauren C. Kiss | ssouthard@klestadt.com lkiss@klestadt.com |
| Kurtzman Steady, LLC | Attn: Jeffrey Kurtzman | kurtzman@kurtzmansteady.com |
| Langley & Banack, Incorporated | Attn: David S. Gragg | dgragg@langleybanack.com |
| Lasser Hochman, L.L.C. | Attn: Richard L. Zucker | rzucker@lasserhochman.com |
| Latham & Watkins LLP | Attn: Marc A. Zelina | marc.zelina@lw.com |
| Latham & Watkins LLP | Attn: Peter M. Gilhuly, Ted A. Dillman | peter.gilhuly@lw.com ted.dillman@lw.com |
| Law Office of Gilbert A. Lazarus, PLLC. | Attn: Gilbert A. Lazarus | gillazarus@gmail.com |
| Law Office of Kevin S. Neiman, PC | Attn: Kevin S. Neiman | kevin@ksnpsc.com |
| Lazarus & Lazarus, P.C. | Attn: Harlan M. Lazarus | hlazarus@lazarusandlazarus.com harlan.lazarus@gmail.com |
| LeCrairRyan, PLLC | Attn: Ilan Markus and Niclas A. Ferland | ilan.markus@leclairryan.com niclas.ferland@leclairryan.com |
| Linebarger Goggan Blair & Sampson, LLP | Attn: Elizabeth Weller | dallas.bankruptcy@publicans.com |
| Linebarger Goggan Blair & Sampson, LLP | Attn: John P. Dillman | houston_bankruptcy@publicans.com |

| NAME | NOTICE NAME | EMAIL |
|---|--|---|
| Linebarger Goggan Blair & Sampson, LLP | Attn: David G. Aelvoet | sanantonio.bankruptcy@publicans.com |
| Linowes and Blocher LLP | Attn: John T. Farnum, Esq. | jfarnum@linowes-law.com |
| Locke Lord LLP | Attn: Brian A. Raynor, Aaron C. Smith, David W. Wirt | braynor@lockelord.com asmith@lockelord.com dwirt@lockelord.com |
| Lowenstein Sandler LLP | Attn: Bruce Buechler | bbuechler@lowenstein.com |
| McCreary, Veselka, Bragg & Allen, P.C. | Attn: Lee Gordon, Tara LeDay | tleday@mabalaw.com |
| McGlinchey Stafford, PLLC | Attn: Brian S. McGrath, Kristen D. Romano | bmcgrath@mcglinchey.com kromano@mcglinchey.com |
| McGlinchey Stafford, PLLC | Attn: Mark J. Chaney, Esq., Richard A. Aguilar, Esq., Rudy J. Cerone, Esq. | mchaney@mcglinchey.com raguilar@mcglinchey.com rcerone@mcglinchey.com |
| Missouri Department of Revenue, Bankruptcy Unit | Attn: Steven A. Ginther, Special Assistant Attorney General | sdnyecf@dor.mo.gov |
| Morgan, Lewis & Bockius LLP | Attn: Laura McCarthy | laura.mccarthy@morganlewis.com |
| Morgan, Lewis & Bockius LLP | Attn: Neil E. Herman | neil.herman@morganlewis.com |
| Morris James LLP | Attn: Stephen M. Miller | smiller@morrisjames.com |
| Morris, Nichols, Arsh & Tunell. LLP | Attn: Curtis S. Miller, Joseph C. Barsalona II | cmiller@mnat.com jbarsalona@mnat.com |
| Morrison Cohen LLP | Attn: Joseph T. Moldovan, Robert K. Dakis | bankruptcy@morrisoncohen.com |
| Munsch Hardt Kopf & Harr, P.C. | Attn: Deborah M. Perry | dperry@munsch.com |
| National Association of Attorneys General | Attn: Karen Cordry | kcordry@naag.org |
| Nelson Mullins Riley & Scarborough LLP | Attn: Jody A. Bedenbaugh | jody.bedenbaugh@nelsonmullins.com |
| Nelson Mullins Riley & Scarborough LLP | Attn: Shane G. Ramsey | shane.ramsey@nelsonmullins.com |

| NAME | NOTICE NAME | EMAIL |
|--|--|--|
| Norton Rose Fulbright US LLP | Attn: Howard Seife, Esq., & Christy Rivera, Esq. | howard.seife@nortonrosefulbright.com christy.rivera@nortonrosefulbright.com |
| Office of the Texas Attorney General | Attn: Rachel R. Obaldo, Assistant Attorney General | rachel.obaldo@oag.texas.gov |
| Office of The United States Trustee for Region 2 | Attn: Paul Schwartzberg, Richard Morrissey | richard.morrissey@usdoj.gov paul.schwartzberg@usdoj.gov |
| O'Keefe & Associates Law Corporation, P.C. | Attn: Sean A. O'Keefe | sokeefe@okeefelc.com |
| Paco (China) Garment Ltd | Attn: Lily Wang | lily@pacogarment.com |
| Parker Poe Adams & Bernstein LLP | Attn: Kiah T. Ford IV | chipford@parkerpoe.com |
| Paul Hastings LLP | Attn: Leslie A. Plaskon, Esq., Andrew V. Tenzer, Esq., Shlomo Maza, Esq. | leslieplaskon@paulhastings.com andrewtenzer@paulhastings.com shlomomaza@paulhastings.com |
| Perdue, Brandon, Fielder, Collins & Mott, L.L.P. | Attn: Ebony Cobb | ecobb@pbfcml.com |
| Perdue, Brandon, Fielder, Collins & Mott, L.L.P. | Attn: Laura J. Monroe | lmbkr@pbfcml.com |
| Perdue, Brandon, Fielder, Collins & Mott, L.L.P. | Attn: Owen M. Sonik | osonik@pbfcml.com |
| Pick & Zabicki LLP | Attn: Douglas J. Pick | dpick@picklaw.net |
| Pierce McCoy, PLLC | Attn: Jonathan A. Grasso | jon@piercemccoy.com |
| Price Meese Shulman & D'Arminio, P.C. | Attn: Rick A. Steinberg | rsteinberg@pricemeese.com |
| Prime Clerk LLC | Attn: Herb Baer, Richard M. Allen | searsteam@primeclerk.com serviceqa@primeclerk.com |
| Procopio, Cory, Hargreaves & Savitch LLP | Attn: Gerald P. Kennedy | gerald.kennedy@procopio.com |
| Pryor & Mandelup, L.L.P. | Attn: Robert L. Pryor | rlp@pryormandelup.com |
| Reid and Riege, P.C. | Attn: Charles J. Filardi, Jr. | cfilardi@rrlawpc.com |

| NAME | NOTICE NAME | EMAIL |
|---|--|---|
| Reiss+Preuss LLP | Attn: Guy A. Reiss, Erik Tikkanen | greiss@reisspreuss.com etikkanen@reisspreuss.com |
| Robert E. Michael & Associates PLLC | Attn: Robert E. Michael, Aaron Hume | Robert.e.michael.esq@gmail.com Aron.hume@gmail.com |
| Robinson Brog Leinwand Greene Genovese & Gluck P.C. | Attn: Fred B. Ringel, Esq. | fbr@robinsonbrog.com |
| Ropes & Gray LLP | Attn: Gregg M. Galardi, Kimberly J. Kodis, Sam N. Ashuraey | gregg.galardi@ropesgray.com kimberly.kodis@ropesgray.com sam.ashuraey@ropesgray.com |
| Ropes & Gray LLP | Attn: James M. Wilton, Patricia I. Chen | james.wilton@ropesgray.com patricia.chen@ropesgray.com |
| Rosen & Associates, P.C. | Attn: Sanford P. Rosen, Esq. | srosen@rosenpc.com |
| S&D Law | Attn: Steven W. Kelly | skelly@s-d.com |
| Sahn Ward Coschignano, PLLC | Attn: Robert A. Abiuso, Matthew C. McCann | mmccann@swc-law.com rabiuso@swc-law.com |
| Sakar | Attn: Jay Weinblatt | jweinblatt@sakar.com |
| Satterlee Stephens LLP | Attn: Christopher R. Belmonte, Abigail Snow, Pamela Bosswick | cbelmonte@ssbb.com asnow@ssbb.com pbosswick@ssbb.com |
| Saul Ewing Arnstein & Lehr LLP | Attn: Dipesh Patel | dipesh.patel@saul.com |
| Saul Ewing Arnstein & Lehr LLP | Attn: Phillip M. Hudson III, Carmen Contreras-Martinez | phil.hudson@saul.com carmen.contreras-martinez@saul.com |
| Securities & Exchange Commission | Attn: Secretary of the Treasury | secbankruptcy@sec.gov NYROBankruptcy@sec.gov |
| Securities & Exchange Commission – NY Office | Attn: Bankruptcy Department | bankruptcynoticeschr@sec.gov |
| Seyfarth Shaw LLP | Attn: Edward M. Fox | emfox@seyfarth.com |
| Shearman & Sterling LLP | Attn: Fredric Sosnick, Sara Coelho | fsosnick@shearman.com sara.coelho@shearman.com |

| NAME | NOTICE NAME | EMAIL |
|---|--|---|
| Sheppard Mullin Richter & Hampton, LLP | Attn: Alan M. Feld, Esq., Ted Cohen, Esq. | afeld@sheppardmullin.com tcohen@sheppardmullin.com |
| Shutts & Bowen LLP | Attn: Ryan C. Reinert, Esq. | rreinert@shutts.com |
| Simon Property Group, L.P. | Attn: Ronald M. Tucker, Esq. | rtucker@simon.com |
| Singer & Levick, P.C. | Attn: Michelle E. Shriro | mshriro@singerlevick.com |
| Skadden, Arps, Slate, Meagher & Flom LLP | Attn: Paul Leake, Esq., Shana Elberg, Esq., and George R. Howard, Esq. | paul.leake@skadden.com shana.elberg@skadden.com george.howard@skadden.com |
| Skadden, Arps, Slate, Meagher & Flom LLP | Attn: Paul Leake, Esq., Shana Elberg, Esq., and George R. Howard, Esq. | Paul.Leake@skadden.com Shana.Elberg@skadden.com George.Howard@skadden.com |
| Skierski Jain PLLC | Attn: Doug Skierski, Kristin H. Jain | enotices@skijain.com |
| Smiley Wang-Ekvall, LLP | Attn: Lei Wang Ekvall, Philip E. Strok | pstrok@swelawfirm.com |
| Sorenson Van Leuven, PLLC | Attn: James E. Sorenson | bk@svllaw.com |
| SRAC Medium Term Notes | Attn: Mary A. Callahan Vice President | mary.callahan@bnymellon.com |
| SRAC Unsecured Notes | Attn: Mary A. Callahan Vice President | mary.callahan@bnymellon.com |
| Stark & Stark, P.C. | Attn: Thomas S. Onder, Joseph H. Lemkin | tonder@stark-stark.com jlemkin@stark-stark.com |
| Stevens & Lee, P.C. | Attn: Constantine D. Pourakis | cp@stevenslee.com |
| Streusand, Landon, Ozburn & Lemon, LLP | Attn: Sabrina L. Streusand | streusand@slollp.com |
| Sullivan & Cromwell LLP | Attn: Andrew G. Dietderich, Brian D. Glueckstein, David R. Zylberberg | dietdericha@sullcrom.com zylberbergd@sullcrom.com |
| Tannenbaum Helpern Syracuse & Hirschtritt LLP | Attn: Michael J. Riela | Riela@thsh.com |

12 of 15

| NAME | NOTICE NAME | EMAIL |
|---|---|---|
| Taubman Landlords | Attn: Andrew S. Conway | aconway@taubman.com |
| The Pension Benefit Guaranty Corporation (PBGC) | Attn: Judith Starr, Kartar S. Khalsa, William McCarron, Jr., & Adi Berger, Director | Starr.Judith@pbgc.gov mccarron.william@pbgc.gov efile@pbgc.gov |
| Thompson Hine LLP | Attn: Curtis L. Tuggle | Curtis.Tuggle@ThompsonHine.com |
| TJ Tianxing Kesheng Leather Products Co Ltd | Attn: Power Wang | powerwangtxks@vip.126.com |
| TN Dept of Revenue | Attn: Herbert H. Slatery III, Marvin E. Clements, Jr. | AGBankNewYork@ag.tn.gov |
| U.S. Bank National Association | Attn: Jose A Galarza, Vice President, Global Structured Finance | jose.galarza@usbank.com |
| US Attorney for Southern District of New York | Attn: Bankruptcy Division | David.Jones6@usdoj.gov Jeffrey.Oestericher@usdoj.gov Joseph.Cordaro@usdoj.gov Carina.Schoenberger@usdoj.gov Lawrence.Fogelman@usdoj.gov Peter.Aronoff@usdoj.gov Linda.Riffkin@usdoj.gov |
| Vedder Price P.C. | Attn: Kevin J. Etzel | ketzel@vedderprice.com |
| Vedder Price P.C. | Attn: Michael L. Schein | mschein@vedderprice.com |
| Waldrep LLP | Attn: Thomas W. Waldrep, Jr. | notice@waldrepllp.com |
| Warner Norcross + Judd LLP | Attn: Gordon J. Toering | gtoering@wnj.com |
| Weil, Gotshal & Manges LLP | Attn: Ray C. Schrock, P.C., Jacqueline Marcus, Garrett A. Fail, Sunny Singh | ray.schrock@weil.com garrett.fail@weil.com jacqueline.marcus@weil.com sunny.singh@weil.com JeriLeigh.Miller@weil.com jessica.liou@weil.com Paloma.VanGroll@weil.com |
| Weiss Zarett Brofman Sonnenklar & Levy, P.C. | Attn: Michael D. Brofman, Esq. | mbrofman@weisszarett.com |
| Whiteford, Taylor & Preston LLC | Attn: Stephen B. Gerald | sgerald@wtplaw.com |

13 of 15

| NAME | NOTICE NAME | EMAIL |
|--|--|---|
| Williams Legal Advisory Group, LLC | Attn: Amy M. Williams | awilliams@williamsadvisors.com |
| Willkie Farr & Gallagher LLP | Attn: Alan J. Lipkin, Gabriel Brunswick | alipkin@willkie.com gbrunswick@willkie.com |
| Wilmington Trust, National Association | Attn: Steven Cimalore, Vice President | scimalore@wilmingtontrust.com |
| Wolf, Rifkin, Shapiro, Schulman & Rabkin, LLP | Attn: Simon Aron | saron@wrslawyers.com |
| Wyatt, Tarrant & Combs, LLP | Attn: Mary L. Fullington | mfullington@wyattfirm.com |